

**REMARKS**

This Response, filed in reply to the Office Action dated July 17, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 2-13 have been examined. Claims 3-4 and 6-7 have been rejected under 35 U.S.C. § 102(b), and claims 2, 5 and 8, 9-13 have been rejected under 35 U.S.C. § 103(a).

**I. Rejection under 35 U.S.C. § 102(b)**

Claims 3-4 and 6-7 have been rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by Cohen et al. ("Cohen"), U.S. 2002/0108118.

With regard to claim 3, Applicant maintains that Cohen fails to teach or suggest each feature of the claim. The Examiner contends since the USB communications protocol includes a procedure for identifying newly connected devices, it is inherent that each photography device must have unique identification information and the identification information must be transmitted to the data processing device via an image information transmission means. Applicant respectfully disagrees.

Even assuming that the USB communications protocol includes a procedure for identifying newly connected devices, it is not inherent that each photography device must have unique identification information or that the identification information must be transmitted to the data processing device via an image information transmission means. The identification in the USB communications protocol is used for establishing a communications link between the data processing device and the photography device. Such identification is not used as identity of photography devices.

For example, when downloading image files from two different cameras to a computer using one or more USB connections, it is common that the identity of the cameras is not available from the image files downloaded from the cameras and stored in the computer. Therefore, the disclosure of using the USB communications protocol to establish a communication link between the photography device and data processing device does not inherently teach or suggest that each photography device must have unique identification information or that the identification information must be transmitted to the data processing device via an image information transmission means.

In view of the foregoing, claim 3 is patentable. Claim 4 is patentable because it includes features that are similar to those of claim 3. Claims 6 and 7 are patentable at least because of their respective dependencies.

## **II. Rejection under 35 U.S.C. § 103(a)**

Claims 2, 5 and 9-13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Cohen in view of Park et al. ("Park") U.S. 6,731,305.

With regard to claim 2, Applicant would submit that the combination of Cohen and Park fails to teach or suggest each feature of the claim. For example, claim 2 recites that the image information transmission means has a function to transmit the identification information in association with the acquired image information to a plurality of data processing devices.

Park relates to a camera system which records camera identification in an image file for seeming multiple images from different cameras into a panoramic image. The camera includes an EPROM, which contains a unique serial number, i.e., an ID of the camera. Col. 4, lines 5-11. A computer can send a control signal to an embedded controller in the camera to read the ID from the EPROM and send the ID to the computer. Col. 4, lines 11-14. The computer has a file

assembly program, which assembles the images from the camera into files. Col. 4, lines 15-17.

Each file has a header with metadata which includes the ID of the camera that created the image.

Col. 4, lines 17-28.

The Examiner correctly concedes that the primarily reference Cohen fails to teach a plurality of processing devices. The Examiner cites Park to make of this deficiency. However, because Park only discloses a single panoramic processor, Park also does not teach a plurality of process devices.

Furthermore, Park also fails to teach identification information unique to a camera, that is transmitted in association with an acquire image. Park at most discloses a unique ID for each of the camera. Park, however, only teaches transmitting separately the ID of the camera and the images in the camera to the computer. The ID of the camera and the images are only assembled after they are transmitted to the computer by the file assembly program in the computer. In contrast, claim 2 recites that the image information transmission means has a function to transmit the identification information in association with the acquired image information to a plurality of data processing devices.

Therefore, claim 2 is patentable. Claims 5 and 9-13 are patentable either because of their dependency or because they include features that are similar to those of claim 2.

In addition, the present invention describes that the processor and camera are remote, or separate from each other. The photography device can thus act independently of other photography devices. This separate operation requires identification information to be associated with the photography device. In contrast, in Park, the photography devices are contained in a common case and are controlled by a common controller. There is no separation or remoteness. Therefore, there is no requirement in Parks to associate identification information unique to a

photography device with each acquired image information. To include such information would be to increase data traffic in the network, causing unnecessary data congestion of useless information.

**III. Rejection under 35 U.S.C. § 103(a)**

Claim 8 has been rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Cohen in view of Park and further in view of Dutta US 2003/0076408.

Claim 8 is patentable because Dutta fails to cure the noted deficiencies of Cohen and Park.

**IV. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

  
Susan P. Pan  
Registration No. 41,239

Date: November 19, 2007